

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS
(Eastern Division)**

In re:

**WATER'S EDGE LIMITED
PARTNERSHIP,**

Debtor.

Chapter 11

Case No. 24-12445-CJP

**MOTION BY DEBTOR FOR ENTRY OF ORDER
EXTENDING TIME FOR FILING OF SCHEDULES AND RELATED DOCUMENTS
(*Emergency Determination Requested*)**

Water's Edge Limited Partnership, the debtor and debtor-in-possession in the above captioned Chapter 11 case (the “Debtor”), requests that this Court enter an order pursuant to Rule 1007(c) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and MLBR 1007-1(g), granting the Debtor an extension of time from December 19, 2024, to January 15, 2025 to file its schedules, summary of assets and liabilities, declaration for non-individual debtors, statement of financial affairs, disclosure of attorney compensation, list of 20 largest creditors, list of equity security holders, and disclosure of ownership statement (collectively the “Schedules”). The Debtor requires additional time to complete the collection of information in order to ensure that it files accurate and complete Schedules. In support of this motion, the Debtor states as follows:

1. On December 5, 2024, the Debtor filed a voluntary petition for relief under Chapter 11 the United States Bankruptcy Code (“Bankruptcy Code”).
2. Pursuant to Section 521 of the Bankruptcy Code and Bankruptcy Rule 1007(a) and (c), the Debtor is required to file the Schedules by December 19, 2024.

3. Bankruptcy Rule 1007(c) provides the Court the power to grant extensions of time for the filing of the Schedules for cause shown. See Fed. R. Bankr. P. 1007(c). Cause exists to grant the extension requested herein.

4. The Debtor owns and operates 364, 370 and 388 Ocean Avenue in Revere, Massachusetts, which are known as Water's Edge Apartments (the "Properties"). The Properties consists of three (3) apartment buildings situated on a 4.95-acre site with a total of 306 units. 364 Ocean Avenue includes a 13-story apartment building with 92 apartment units. 370 Ocean Avenue includes a 16-story apartment building with 95 apartment units.

5. The Debtor filed its chapter 11 case to stay a foreclosure sale by the first mortgage holder against the Properties and preserve the equity in those Properties for the benefit of its creditors.

6. Following the Petition Date, and subject to the approval of the Court, the Debtor has engaged, among other professionals, Murphy & King, Professional Corporation as its general bankruptcy counsel and Verdolino & Lowey, P.C. as its financial advisor.

7. The Debtor and its professionals have been actively engaged in compiling and assembling the information required for the Schedules, which is voluminous, and require additional time to review the documents assembled to date, to gather any additional necessary financial information, and to confer.

8. Because of the Debtor's recent retention of professionals, the complexity of this case, and the intervening holidays, the Debtor requires additional time to ensure the Schedules are accurately completed.

9. The Section 341 meeting is scheduled to occur on January 6, 2025. The Debtor intends to confer with the United States Trustee and work cooperatively to seek a continuance of

that date in consideration of the above circumstances. As such, the Debtor anticipates that the requested extension will not prejudice creditors or any other parties-in-interest it anticipates that parties in interest will have ample opportunity to review the Schedules prior to the rescheduled meeting date.

10. Accordingly, the Debtor believes the requested extension is warranted.

Emergency Determination Requested

11. Pursuant to MLBR 9013-1(g), the Debtor requests that the requested relief be considered on an emergency basis because the Schedules are due today, December 19, 2024.

WHEREFORE, the Debtor respectfully requests that this Court enter an order (a) extending to January 15, 2025, the deadline for the Debtor to file the Schedules; and (b) granting to the Debtor such other and further relief as the Court deems just and proper in the circumstances.

Respectfully submitted,

WATER'S EDGE LIMITED PARTNERSHIP,
By its proposed counsel,

/s/ Kathleen R. Cruickshank
Harold B. Murphy (BBO # 326610)
Kathleen R. Cruickshank (BBO #550675)
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Dated: December 19, 2024

CERTIFICATE OF SERVICE

I, Kathleen R. Cruickshank, hereby certify that on December 19, 2024, I caused a copy of the foregoing motion to be filed through the CM/ECF system and served electronically upon all parties entitled to notice thereunder.

/s/ Kathleen R. Cruickshank
Kathleen R. Cruickshank